

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES ROBINSON,

Plaintiff,

V.

Civil Action No. 04-11964-NG

TELESECTOR RESOURCES GROUP, INC. D/B/A)

VERIZON SERVICES GROUP,

Defendant.

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56(c) and Local Rule 56.1, the Defendant, Telesector Resources Group, Inc. d/b/a Verizon Services Group (“Verizon”), respectfully moves the Court to enter summary judgment for the Defendant on all Counts of Plaintiff’s Complaint. For the reasons set forth in the attached Memorandum of Law, there are no genuine issues of material fact and Plaintiff has failed to present sufficient evidence in support of his claims. Accordingly Verizon is entitled to judgment as a matter of law on all counts of Plaintiff’s Complaint.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), the Defendant believes oral argument will assist the Court and wishes to be heard on this matter.

Respectfully submitted,

The Defendant,
TELESECTOR RESOURCES GROUP, INC.
D/B/A VERIZON SERVICES GROUP,
By its attorneys,

/s/ John P. McLafferty
John P. McLafferty, BBO #639179
Felix J. Springer (pro hac vice)
DAY, BERRY & HOWARD LLP
One International Place
Boston, Massachusetts 02110
(617) 345-4600

DATED: October 21, 2005

CERTIFICATE OF SERVICE

I, John P. McLafferty, do hereby certify that on this 21st day of October, 2005, I caused a true copy of the foregoing to be hand delivered to Frank L. Fragomeni, Jr., Esquire, 15 Broad Street, Suite 501, Boston, Massachusetts 02109.

/s/ John P. McLafferty
John P. McLafferty